



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUL 24 2014

REPLY TO THE ATTENTION OF:

Ms. Chrissy Bartovich  
United States Steel Corporation  
Minnesota Ore Operations  
P.O. Box 417  
Mountain Iron, Minnesota 55768

Dear Ms. Bartovich:

Thank you for your letter of March 3, 2014, concerning permitting for the replacement of the existing wet scrubber with dry controls at the Minntac facility. Based on your letter, it appears there is some confusion regarding EPA's views with respect to whether and to what extent Prevention of Significant Deterioration (PSD) permitting requirements should be addressed before this project may proceed. Specifically, the U.S. Environmental Protection Agency has not determined that the change in control equipment is a major modification under the PSD program. Based on information provided by US Steel and the Minnesota Pollution Control Agency (MPCA), it is our understanding that the change will not result in a significant net emissions increase and therefore will not require a new PSD permit; however, the project will impact the conditions of a previously issued federal PSD permit, so EPA believes a revision to that permit is required.

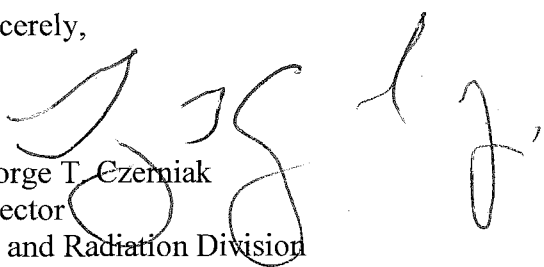
The December 14, 2012, Noranda Alumina, LLC, Title V petition response, petition number VI-2011-04 (Noranda) provides a summary of past Agency statements on PSD permit revisions. As stated in the Noranda response:

"Revisions of a previously-issued PSD permit usually pertain to actions that are not themselves major modifications invoking the requirement to obtain a PSD permit. Consequently, revisions of a previously issued PSD permit are not necessarily required to meet all the requirements that apply in the case of a PSD permit issued to authorize a major modification of an existing stationary source."

Where revisions involve more than administrative changes, as in the case of the proposed pollution control equipment changes at US Steel, EPA advises permitting authorities to provide an opportunity for public comment. As a delegated PSD program, MPCA would look to 40 CFR Part 124 for the requirements of public notice. US Steel should work with MPCA to determine the scope of the PSD requirements appropriate for this revision. Generally, the revised PSD permit should be supported by a record showing that the revised permit meets all applicable PSD requirements in the same manner as the previously issued permit.

If you have any further questions or concerns regarding EPA's views, please contact Rachel Rineheart, of my staff at (312) 886-7017.

Sincerely,



George T. Czerniak  
Director  
Air and Radiation Division